

Serial No. 09/728,257  
Amdt. Dated February 21, 2005  
Reply to Office Action of January 6, 2005

### **REMARKS/ARGUMENTS**

Prior to this Amendment, claims 1-3, 5-11, 13, 14, 16, 18-21, 23, and 24 were pending in the application.

In this Amendment, claim 1 and independent claims 10 and 16 are amended to clarify that "all identification information" is removed during the modifying by the tunnel mechanism to hide access to the internal computer device from the external client.

Independent claim 19 is amended to clarify that unresolved error messages are included in a modified response but without identification information for the source of the error message, i.e., the interior device.

Claims 23 and 24 are canceled.

No new matter is added by the claim amendments with support found at least in Applicant's specification from page 11, line 30 to page 15, line 14, which provides an example of removing all identification information for an internal computer device (i.e., one behind the firewall) and also, with regard to claim 10, indicating in the response that the source of the response was the tunnel mechanism.

Claims 1-3, 5-11, 13, 14, 16, and 18-21 remain for consideration by the Examiner.

### **Rejections Under 35 U.S.C. §112**

The Office Action rejected claims 23 and 24 under §112, second paragraph as being indefinite. Claims 23 and 24 are canceled to facilitate prompt allowance of the application.

### **Rejections Under 35 U.S.C. §103**

In the January 6, 2005 Office Action, claims 1-3, 5-7, 9-11, 13-14, 16, 18-21, and 23-24 were rejected under §103(a) as being unpatentable over U.S. Patent No. 6,311,269 ("Luckenbaugh") in view of Lincoln D. Stein, "Web Security..." ("Stein") further in view of "Firewall Port Security" (Grammatis). Claims 23 and 24 are canceled. The rejection of the remaining pending claims is respectfully traversed based on the claim amendments and the following remarks.

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In the Response to Amendment portion of the Office Action, the Examiner indicated that claim 1 as previously presented did not reflect the intended use of the invention for hiding a computer device that is behind a firewall and that is accessed to obtain a response. Further, the Examiner cited a Stallings reference for showing that some identification information is removed during communication between two network-linked entities. To address these assertions by the Examiner, claim 1 (and, also claim 10) is amended such that "all identification information" is removed from the response received from the internal computer device by the tunnel mechanism "whereby access to the computer device to obtain the response is hidden from the external client." Applicant believes that this amendment of claim 1 should address Examiner's concerns, and claim 1 is now in condition for allowance.

Further, as noted in Applicant's prior response, Luckenbaugh fails to teach that the tunnel mechanism receives requests from clients after they have been filtered by a firewall. Apparently, the use of the CGI and the security cookies of Luckenbaugh are used to provide the functions of the firewall. Stein teaches firewall usage but provides no motivation to combine the use of a firewall with the teaching of other security measures, such as that of Luckenbaugh. The only motivation for combining the two references appears to come from Applicant's specification. Grammatidis teaches the use of ports in firewalls, but the combined teaching of Luckenbaugh, Stein, and Grammatidis fails to show the use of a tunnel mechanism for modifying a response from an internal computer device to remove all indication information to hide accessing the device from an external client. For this additional reason, claim 1 is allowable over this reference taken alone or in combination with the other references.

Claims 2, 3, 5-7, and 9 depend from claim 1 and are believed allowable at least for the reasons for allowing claim 1.

Independent claim 10 is directed to a method similar to claim 1 and the reasons for allowing claim 1 are believed equally applicable to claim 10. Further, claim 10 calls for all the identification to be removed and for the identification information to include "URL information for the internal device." Further the

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modification includes replacing the internal URL information with URL information for the tunnel mechanism." As discussed above, Luckenbaugh and the other references fail to teach modifying a response to remove all the identification information for an internal network device. For this reason alone, claim 10 is not made obvious by the combined teaching of these three references.

Further, the original Office Action provides no specific citation for or any reason for finding the "replacing the internal URL information with URL information for the tunnel mechanism" taught or suggested by the references. Luckenbaugh even when combined with Stein and Grammatidis does not teach providing URL information for the CGI to the external client and Applicant could find no relevant teaching in the other references. Because a prima facie case of obviousness is not presented by the Office Action, the rejection of claim 10 should be withdrawn.

The Response to Amendment at para. 11 indicated that Luckenbaugh teaches this limitation at col. 8, lines 17-20 and col. 9, lines 21-32. Applicant disagrees with this interpretation of Luckenbaugh. At the col. 8 citation, Luckenbaugh is discussing processing an input URL to determine a data file to be accessed by the "CGI." At the col. 9 citation, Luckenbaugh is describing with reference to Figure 3 how to build an HTML page based on a cookie value, but there is no teaching that the response is modified to indicate that it will include URL information for a device other than a true source for a response, i.e., that the response will include URL information for the tunnel mechanism rather than the source or internal device. Because none of the references considered alone or in combination, teach hiding an internal client by indicating a tunnel mechanism is the source of a response by including its URL information, the rejection of claim 10 based on 103(a) is improper and should be withdrawn.

Claims 11, 13, and 14 depend from claim 10 and are believed allowable as depending from an allowable base claim.

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Independent claim 16 is directed to a system with limitations similar to those of claim 1 provided in apparatus format. Hence, the reasons provided for allowing claim 1 are applicable to claim 16. Claim 18 depends from claim 16 and is believed allowable as depending from an allowable base claim.

Independent claim 19 is directed to a computer readable medium with computer readable program code devices to cause a computer to "translate error messages in the received response, to take response actions to the error messages, and to include unresolved ones of the translated error messages in the modified response." As discussed with reference to claim 8, Luckenbaugh and the other cited references fail to teach identifying error messages in a "response" and taking corrective responses. Instead, Luckenbaugh merely teaches identifying "requests" that fail to include cookie values. The cited references fail to teach or suggest every element of claim 19 and hence, the rejection of claim 19 and claims 20 and 21 which depend from claim 19 is not proper and should be withdrawn. Further, claim 21 includes limitations similar to claim 1 and is believed allowable for the reasons provided for allowing claim 1.

The Response to Amendment in para. 13 failed to provide a specific citation for the computer readable program code devices configured to "cause a computer to translate error messages in the received response, to take response actions to the error messages, and to include unresolved ones of the translated error messages in the modified response." In fact, the Response to Amendment indicated that this limitation is NOT taught by Luckenbaugh but indicated the rejection can be supported because all of these activities are merely implicit apparently in any computing device. Applicant has amended claim 19 to clarify that the included unresolved error messages do not include any identification information for the interior device. Applicant continues to assert that it is not standard or implicit to take response actions to error messages as such messages typically would simply be passed to a requesting client, and further, it is not implicit that unresolved error messages would be included in a response without identification information for the source of such errors. Hence, in addition to the

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reasons provided for allowing claim 1, claim 19 is believed allowable over the combined teaching of the cited references because they fail to teach or make obvious taking response actions to error messages and if not resolved, including the unresolved error messages without identification information for the internal source of the error.

The January 6, 2005 Office Action further rejected claim 8 based on Luckenbaugh, Stein, and Grammaticis further in view of U.S. Pat. No. 6,092,100 ("Berstis"). This rejection is traversed based on the following remarks.

Claim 8 calls for examining the response for an error message and operating the tunnel mechanism to take corrective actions to remove the error message. The first Office Action on page 7 indicated that Luckenbaugh teaches this element with objects 313, 314 of Figure 3A. However, at this citation, Luckenbaugh is teaching processing a request for a cookie and if none is found, indicating an error to the requesting device. There is no teaching of finding an error in a "response" and correcting the error prior to transmitting the response. The Response to Amendment in para. 6 states that no claims teach addressing error messages in responses from the hidden server or device.

Berstis is, however, cited as providing the limitations of claim 8, which are missing from the other 3 references. Berstis is said to teach at col. 2, lines 43-47 and at col. 1, lines 64-66 correcting an error (such as an incorrect URL in a request). Examiner then argues it would have been obvious to combine the teaching of Berstis with the other 3 references to obtain the invention of claim 8. Applicant disagrees because even if the teaching of Berstis were combined with the other 3 cited references, the invention of claim 8 would not be achieved. Berstis teaches using fuzzy logic to provide a user with a set of URLs that they can select from when the user in their request provides an incorrect URL (see, for example, the Berstis Summary). Claim 8 calls for examining a response from a computer device behind a firewall for an error message.

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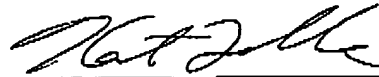
These are different processes. In Berstis, a problem (i.e., a faulty URL address) is found in a request whereas in claim 8 an error message is found in a response from a correctly addressed device. Further, claim 8 then calls for operating the tunnel mechanism to take corrective actions to remove the error message from the response. Berstis in contrast teaches a method of replacing one set of content with another but not removing content (e.g., replace a faulty URL with a good URL). Hence, if Berstis was combined with the other references, there still would be no teaching or suggestion of performing the steps of claim 8. For these additional reasons, claim 8 is believed allowable over Berstis when its teachings are combined with the other cited references.

### Conclusions

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

No fee is believed due for this submittal. However, any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,



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